

**In the Drawings:**

The attached sheets of drawings include new drawing sheet having FIG. 1A. These sheets, which include FIGS. 1 through 5, replace the previous drawing sheets, including FIGS. 1 through 5.

**REMARKS**

These remarks are in response to the Office Action of September 20, 2005 and the Notice of Non-Compliant Amendment under 37 C.F.R. § 1.121 dated, March 28, 2006.

Claims 1 through 11 and 14 through 39 are currently pending in the application.

Claims 1 through 11 have been allowed.

Claims 12 and 13 have been canceled.

Claims 20 through 24 and 33 through 37 are withdrawn from consideration as being drawn to a non-elected invention.

Claims 14 through 32 and 38 through 39 stand rejected. Applicant has amended no claims, and respectfully requests reconsideration of the application as amended herein.

**Objection to Drawings**

The Examiner has objected that changes to the drawings are not explained in detail.

The Applicant respectfully submits that the drawing changes are solely drawing notes which bring additional clarity to the application and as written notes the changes are substantially self explanatory to illustrate the claimed invention of claim 14 and 27 having the negative limitation "the paddle support bars not used for electrical leads for the semiconductor de". However by way of further explanation, FIG. 1 and FIG 1A are separate embodiments of the present invention. The amendments to FIG. 1 include a note showing the die paddle support bars may be used as leads in certain specific instances and a second note describing that there are no electrical leads in the voids defined (or framed) by the lead frames 24, 28, side rails 14 and the die paddle 20. The new FIG. 1A includes the numbered leads which correspond with the numbered leads of FIG. 1 however, the notes at least partially define the difference between the two embodiments including, paddle support bars which are not used as leads under any circumstance and again the voids are declared to have no leads. Applicant asserts that previously drawing FIG. 1 was amended to clearly illustrate the claim limitation calling for "a metallic paddle having no electrical leads for connection to a semiconductor die secured to the second surface of the semiconductor die, the metallic paddle being attached to at least one side rail by at least a plurality of paddle support bars that include one of being used as a lead and not being used as a lead and being attached to a plurality of cross members by the support bars of a paddle

frame”. Such an element of the invention being set forth in the specification on page 6, lines 7 through 11 and in drawing FIGS. 1 through 3. The specification states on page 6, lines 7 through 11, that “Generally, no leads for electrical conduction are provided, although one or more of the paddle support bars 24, 28 may be used as leads in certain specific instances. No narrow ‘leads’ common in lead frames are required in the paddle frame 12, resulting in greater ease of manufacture and increased reliability.” As previously stated, Applicant additionally asserts that, in drawing FIGS. 1 through 5, no narrow leads are illustrated but, rather only paddle support bars 24, 28 are illustrated which may or may not be used as electrical leads separate and distinct from any narrow common electrical leads. Claims 14 and 27 include language of the invention directed to a different embodiment of the inventions calling for “the paddle support bars not used for electrical leads for the semiconductor die.” Applicant wishing to avoid any confusion in drawing FIG. 1 of the application by trying to illustrate two different embodiments of the invention, particularly add the language of claims 14 and 27 calling for “the paddle support bars not used for electrical leads for the semiconductor die” thereto when the amended drawing FIG.1 currently states that “paddle support bars which may be used as leads in certain specific circumstances”, proposes adding drawing FIG.1A to clearly illustrate such elements of the claimed inventions. However, Applicant will amend drawing FIG.1 to include such language to illustrate the claimed inventions of claims 14 and 27 if such is desired to illustrate two different embodiments of the invention.

### **35 U.S.C. § 112 Claim Rejections**

Claims 14 through 19, 25 through 32, 38 and 39 are rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Applicant respectfully traverses this rejection, as hereinafter set forth.

By way of further explanation, FIG. 1 and FIG 1A are separate embodiments of the present invention. The amendments to FIG. 1 include a note showing the die paddle support bars may be used as leads in certain specific instances and a second note describing that there are no electrical leads in the voids defined (or framed) by the lead frames 24, 28, side rails 14 and the

die paddle 20. The new FIG. 1A includes the numbered leads which correspond with the numbered leads of FIG. 1 however, the notes at least partially define the difference between the two embodiments including, paddle support bars which are not used as leads under any circumstance and again the voids are declared to have no leads. Applicant asserts that previously drawing FIG. 1 was amended to clearly illustrate the claim limitation calling for “a metallic paddle having no electrical leads for connection to a semiconductor die secured to the second surface of the semiconductor die, the metallic paddle being attached to at least one side rail by at least a plurality of paddle support bars that include one of being used as a lead and not being used as a lead and being attached to a plurality of cross members by the support bars of a paddle frame”. Such an element of the invention being set forth in the specification on page 6, lines 7 through 11 and in drawing FIGS. 1 through 3. The specification states on page 6, lines 7 through 11, that “Generally, no leads for electrical conduction are provided, although one or more of the paddle support bars 24, 28 may be used as leads in certain specific instances. No narrow ‘leads’ common in lead frames are required in the paddle frame 12, resulting in greater ease of manufacture and increased reliability.” As previously stated, Applicant additionally asserts that, in drawing FIGS. 1 through 5, no narrow leads are illustrated but, rather only paddle support bars 24, 28 are illustrated which may or may not be used as electrical leads separate and distinct from any narrow common electrical leads. Claims 14 and 27 include language of the invention directed to a different embodiment of the inventions calling for “the paddle support bars not used for electrical leads for the semiconductor die.” Applicant wishing to avoid any confusion in drawing FIG. 1 of the application by trying to illustrate two different embodiments of the invention, particularly add the language of claims 14 and 27 calling for “the paddle support bars not used for electrical leads for the semiconductor die” thereto when the amended drawing FIG.1 currently states that “paddle support bars which may be used as leads in certain specific circumstances”, proposes adding drawing FIG.1A to clearly illustrate such elements of the claimed inventions. However, Applicant will amend drawing FIG.1 to include such language to illustrate the claimed inventions of claims 14 and 27 if such is desired to illustrate two different embodiments of the invention.

Applicant has amended the claimed invention as suggested by the Examiner for the presently claimed invention to particularly point out and distinctly claim the subject matter of the invention to comply with the provisions of 35 U.S.C. § 112, first paragraph, wherein new drawing Fig. 1A illustrates the elements of the inventions set forth in independent claims 14 and 27. Therefore, claims 14 through 19, 25 through 32, 38 and 39 are allowable under the provisions of 35 U.S.C. § 112, first paragraph.

### **35 U.S.C. § 112 Claim Rejections**

Claims 14 through 19, 25 through 32, 38 and 39 are rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention. Applicant respectfully traverses this rejection, as hereinafter set forth.

By way of further explanation, FIG. 1 and FIG 1A are separate embodiments of the present invention. The amendments to FIG. 1 include a note showing the die paddle support bars may be used as leads in certain specific instances and a second note describing that there are no electrical leads in the voids defined (or framed) by the lead frames 24, 28, side rails 14 and the die paddle 20. The new FIG. 1A includes the numbered leads which correspond with the numbered leads of FIG. 1 however, the notes at least partially define the difference between the two embodiments including, paddle support bars which are not used as leads under any circumstance and again the voids are declared to have no leads. Applicant asserts that previously drawing FIG. 1 was amended to clearly illustrate the claim limitation calling for “a metallic paddle having no electrical leads for connection to a semiconductor die secured to the second surface of the semiconductor die, the metallic paddle being attached to at least one side rail by at least a plurality of paddle support bars that include one of being used as a lead and not being used as a lead and being attached to a plurality of cross members by the support bars of a paddle frame”. Such an element of the invention being set forth in the specification on page 6, lines 7 through 11 and in drawing FIGS. 1 through 3. The specification states on page 6, lines 7 through 11, that “Generally, no leads for electrical conduction are provided, although one or more of the paddle support bars 24, 28 may be used as leads in certain specific instances. No narrow ‘leads’

common in lead frames are required in the paddle frame 12, resulting in greater ease of manufacture and increased reliability.” As previously stated, Applicant additionally asserts that, in drawing FIGS. 1 through 5, no narrow leads are illustrated but, rather only paddle support bars 24, 28 are illustrated which may or may not be used as electrical leads separate and distinct from any narrow common electrical leads. Claims 14 and 27 include language of the invention directed to a different embodiment of the inventions calling for “the paddle support bars not used for electrical leads for the semiconductor die.” Applicant wishing to avoid any confusion in drawing FIG. 1 of the application by trying to illustrate two different embodiments of the invention, particularly add the language of claims 14 and 27 calling for “the paddle support bars not used for electrical leads for the semiconductor die” thereto when the amended drawing FIG.1 currently states that “paddle support bars which may be used as leads in certain specific circumstances”, proposes adding drawing FIG.1A to clearly illustrate such elements of the claimed inventions. However, Applicant will amend drawing FIG.1 to include such language to illustrate the claimed inventions of claims 14 and 27 if such is desired to illustrate two different embodiments of the invention.

Applicant has amended the claimed invention as suggested by the Examiner for the presently claimed invention to particularly point out and distinctly claim the subject matter of the invention to comply with the provisions of 35 U.S.C. § 112, first paragraph, wherein new drawing Fig. 1A illustrates the elements of the inventions set forth in independent claims 14 and 27. Therefore, claims 14 through 19, 25 through 32, 38 and 39 are allowable under the provisions of 35 U.S.C. § 112, second paragraph.

## **Response to the Notice of Non-Compliant Amendment of March 28, 2006**

### **Objection to Amendments to the Specification**

The proposed amendment to the specification contained in the amendment document filed December 27, 2005 is objected to under 37 CFR § 1.121(b)(1).

The Applicant respectfully submits that the proposed amendment to the specification is a new paragraph. As a new paragraph the relevant code is 37 CFR § 1.121(b)(1)(iii) which reads, “[t]he full text of any added paragraphs without any underlining.”

The Applicant respectfully submits the prior amendment was in conformity with 37 CFR § 1.121, however the format of the amendment above has been revised to avoid any further confusion so that the paragraph is underlined. As such the Applicant requests the amendment to the specification be entered as herein submitted and the objection be withdrawn.

### **Objection to Drawings**

The Examiner has objected that changes to the drawings are not explained in detail.

The Applicant respectfully submits that the drawing changes are solely drawing notes which bring additional clarity to the application and as written notes the changes are substantially self explanatory to illustrate the claimed invention of claim 14 and 27 having the negative limitation “the paddle support bars not used for electrical leads for the semiconductor die”. However by way of further explanation, FIG. 1 and FIG 1A are separate embodiments of the present invention. The amendments to FIG. 1 include a note showing the die paddle support bars may be used as leads in certain specific instances and a second note describing that there are no electrical leads in the voids defined (or framed) by the lead frames 24, 28, side rails 14 and the die paddle 20. The new FIG. 1A includes the numbered leads which correspond with the numbered leads of FIG. 1 however, the notes at least partially define the difference between the two embodiments including, paddle support bars which are not used as leads under any circumstance and again the voids are declared to have no leads. Applicant asserts that previously drawing FIG. 1 was amended to clearly illustrate the claim limitation calling for “a metallic paddle having no electrical leads for connection to a semiconductor die secured to the second surface of the semiconductor die, the metallic paddle being attached to at least one side rail by at least a plurality of paddle support bars that include one of being used as a lead and not being used as a lead and being attached to a plurality of cross members by the support bars of a paddle frame”. Such an element of the invention being set forth in the specification on page 6, lines 7 through 11 and in drawing FIGS. 1 through 3. The specification states on page 6, lines 7 through 11, that “Generally, no leads for electrical conduction are provided, although one or more of the paddle support bars 24, 28 may be used as leads in certain specific instances. No narrow ‘leads’ common in lead frames are required in the paddle frame 12, resulting in greater ease of manufacture and increased reliability.” As previously stated, Applicant additionally asserts that,

in drawing FIGS. 1 through 5, no narrow leads are illustrated but, rather only paddle support bars 24, 28 are illustrated which may or may not be used as electrical leads separate and distinct from any narrow common electrical leads. Claims 14 and 27 include language of the invention calling for “the paddle support bars not used for electrical leads for the semiconductor die.” Applicant wishing to avoid any confusion in drawing FIG. 1 of the application by trying to add the language of claims 14 and 27 calling for “the paddle support bars not used for electrical leads for the semiconductor die” thereto when the amended drawing FIG.1 currently states that “paddle support bars which may be used as leads in certain specific circumstances”, proposes adding drawing FIG.1A to clearly illustrate such elements of the claimed inventions. However, Applicant will amend drawing FIG.1 to include such language to illustrate the claimed inventions of claims 14 and 27 if such is desired.

Each of the amendments to the drawings is fully supported by the specification and claims.

As such the Applicant requests the objection the drawings is withdrawn.



**CONCLUSION**

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicant has amended the claimed invention to clearly distinguish over the cited prior art.

Applicant submits that claims 1 through 11 and 14 through 39 are clearly allowable over the cited prior art.

Applicant requests the allowance of claims 1 through 11 and 14 through 39 and the case passed for issue.

Respectfully submitted,



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## **APPENDIX A**

### **Complete Set of Replacement Drawing Sheets**